

**IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA**

TODD MERCER and SHAWNEE)	
MERCER,)	
)	
Plaintiffs,)	
)	CIVIL ACTION
)	
v.)	FILE NO. 22-C-05773-S2
)	
)	
CIRCLE K STORES, INC. and ABC)	
CORPORATION,)	
)	
Defendants.)	

**PLAINTIFFS' RESPONSES AND OBJECTIONS TO DEFENDANT CIRCLE K
STORES, INC.'S FIRST INTERROGATORIES**

COME NOW, Plaintiffs TODD MERCER and SHAWNEE MERCER, and respond and object to Defendant CIRCLE K STORES, INC.'s Interrogatories as follows:

GENERAL OBJECTIONS

OBJECTION ONE

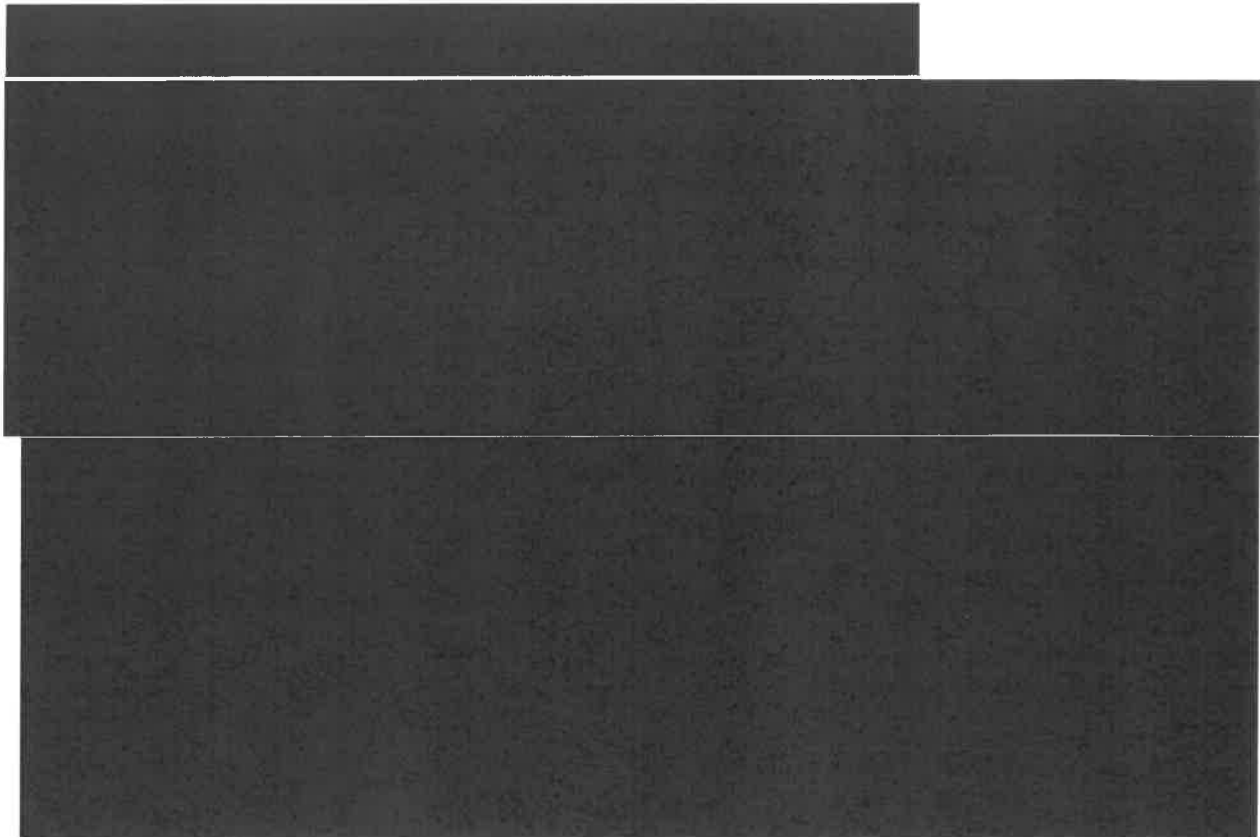
Plaintiffs respectfully object to any part, portion, or paragraph of the Interrogatories which attempt to impose upon Plaintiffs, or do impose upon Plaintiffs, a duty greater than that required under the Georgia Civil Practice Act, or under any other applicable law.

OBJECTION TWO

Plaintiffs respectfully object to any part, portion, or paragraph of the Interrogatories to the extent the same are vague, ambiguous, and/or confusing.

OBJECTION THREE

Plaintiffs respectfully object to any part, portion, or paragraph of the Interrogatories to the extent that any information or document sought relates to the work production of Plaintiffs and/or



5.

Please provide a full and complete itemization of all damages claimed in this case, including, but not limited to, lost wages, past medical expenses, future medical expenses, pain and suffering, and attorney's fees and expenses of litigation.

RESPONSE:

Plaintiffs object to this Interrogatory insofar as it is overly broad, unduly burdensome and to the extent it seeks inadmissible evidence. Subject to this objection and without waiving same, Plaintiffs refer to the chart below:

Plaintiff Todd Mercer's Medical Bills	\$24,058.50+
Future Medical Costs	TBD
Total	\$24,058.50+

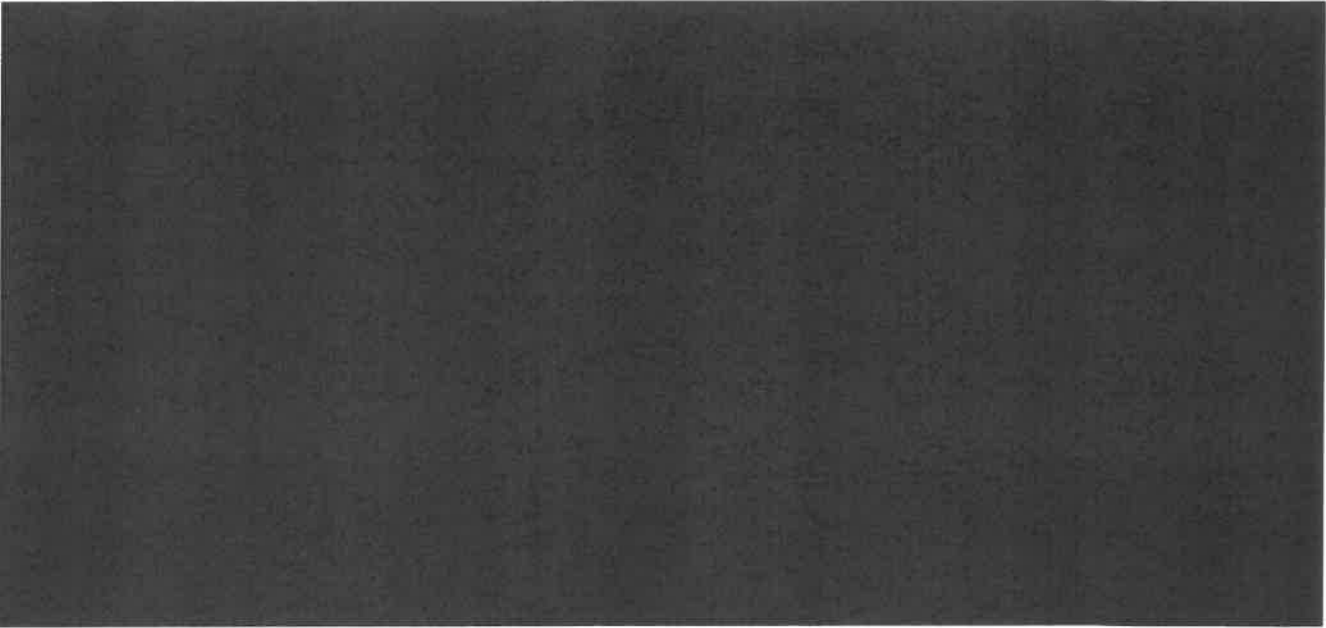


16.

Please describe in complete detail each and every injury which you sustained in the incident that forms the basis of this lawsuit.

RESPONSE:

Plaintiffs object to this Interrogatory insofar as it is overly broad, unduly burdensome and to the extent it seeks a medical opinion or diagnosis that Plaintiffs are not qualified to offer. Subject to this objection and without waiving same, Plaintiff Todd Mercer states his injuries consist of, but are not limited to, back pain, wrist pain, small contusion on head, concussion, left rotator cuff injury, and left wrist fracture. Additionally, Plaintiff has been advised by his medical providers that he will need surgery to correct his injuries. Plaintiff Shawnee Mercer was not involved in subject incident. Plaintiffs reserve the right to supplement this response.



VERIFICATION

Personally appeared before me, an officer duly authorized by law to administer oaths, **TODD MERCER**, who being duly sworn, states under oath that the facts set forth in the above and foregoing responses are true and correct and that said responses are given under oath.

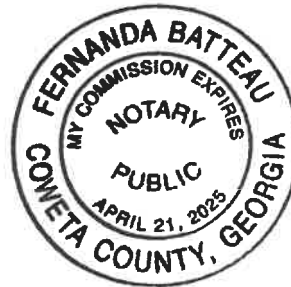


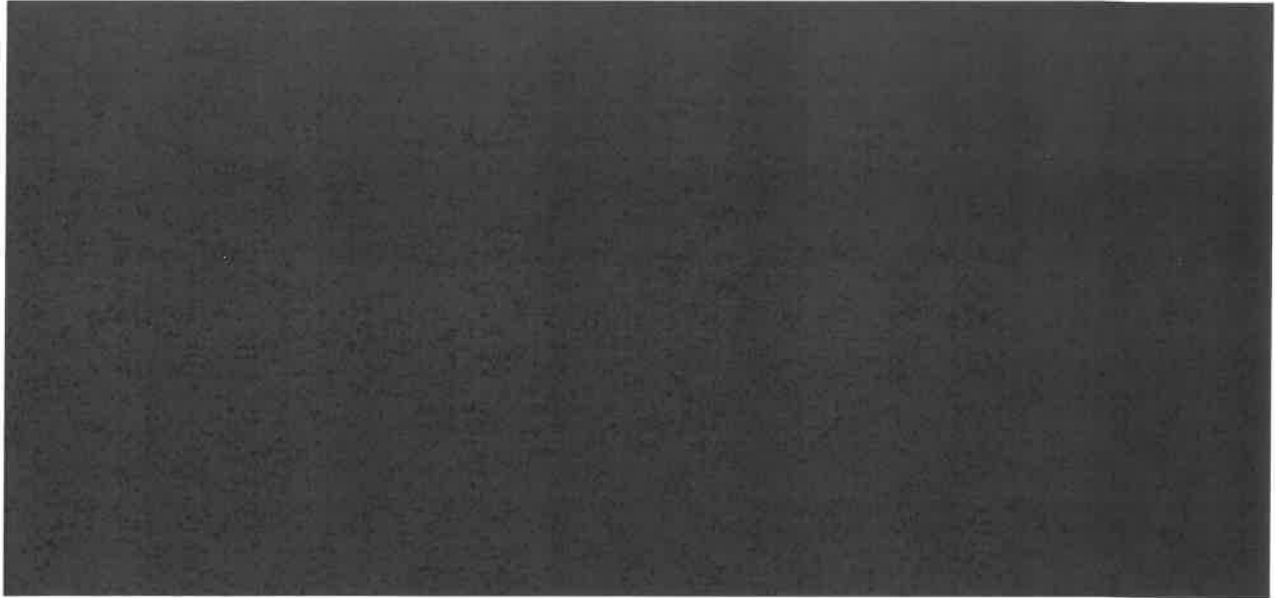
Todd Mercer

Sworn to and subscribed
before me this 14 day of December, 2022.


NOTARY PUBLIC

My commission expires:





This 25th day of January, 2023.

P.O. Box 2593
Peachtree City, GA 30269
(770) 771-5130
(478) 202-7603
jordan@jewkesfirm.com
ava@jewkesfirm.com

THE JEWKES FIRM, LLC

/s/ Jordan M. Jewkes

Jordan M. Jewkes

Georgia Bar No.: 940491

Ava K. O'Brien

Georgia Bar No.: 668928

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing pleading upon all parties to this matter by e-mail and/or depositing a true copy of same in the U.S. Mail, proper postage prepaid, addressed to counsel of record as follows:

Sean W. Martin
Stephen A. Swanson
Carr Allison
736 Market Street, Suite 1320
Chattanooga, TN 37402
swmartin@carrallison.com
sswanson@carrallison.com
Attorneys for Defendant
Circle K Store, Inc.

This 25th day of January, 2023.

THE JEWKES FIRM, LLC

/s/ Jordan M. Jewkes

Jordan M. Jewkes

Georgia Bar # 940491

Ava K. O'Brien

Georgia Bar # 668928

Attorneys for Plaintiffs

P.O. Box 2593
Peachtree City, Georgia 30269
Telephone: (770) 771-5130
Fax: (478) 202-7603
jordan@jewkesfirm.com
ava@jewkesfirm.com